

KAUFMAN & KAHN, LLP

MEMO ENDORSED

August 16, 2023

*The conference is
adjourned to September 7,
2023 at 10:00 A.M.*

BY ECF

Hon. Judge Paul G. Gardephe
United States District Court, Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.
August 16, 2023

Re: TF Entertainment Corp., et al. v. Safavieh, Inc., et al. (No. 1:23-cv-3218-PGG)

To the Honorable Judge Gardephe:

We are counsel to defendant-counterclaimants Safavieh, Inc. and Safavieh Intl LLC in the above-referenced case. Following our telephone call early this afternoon with Chambers and plaintiff's counsel, counsel for all parties request that the Pre-Trial Conference presently scheduled for August 17, 2023 be adjourned for two weeks until August 31, 2023. The reason for the adjournment is that counsel have made progress in resolving the case, as the parties are negotiating the terms of a Stipulated Permanent Injunction and hope to file a proposed order for the same later today. That would leave only the monetary amount necessary to be negotiated. Plaintiffs' counsel suggested and consented to this proposed adjournment.

The parties also respectfully request that if the case is not settled before any adjourned pre-trial conference that the parties have leave to file an amended proposed Scheduling Order, because all of the dates in the present proposed Order assume that it would be signed at tomorrow's conference.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Mark S. Kaufman
Mark S. Kaufman

cc. (by ECF):
Christopher Collins
Bill Chimos